

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

=====X Docket No.: 07-CV-6432 (RJH)  
SALLY ANN DRUCKER,

Plaintiff,

RULE 26 (a) (1)

INITIAL DISCLOSURE

-against-

JOHN D. CORRIERI AND PAUL D. CORRIERI,

Defendants.

=====X

Defendants, by its attorneys, KRAL, CLERKIN, REDMOND, RYAN, PERRY & GIRVAN, LLP, as and for their Rule 26(a)(1) Initial Disclosures, sets forth the following upon information and belief:

(A) Witnesses likely to have discoverable information that may be used by defendants to support their defenses (unless solely for impeachment purposes) include: (1) Paul Corrieri.

(B) Defendants are not in possession of any accident reports regarding this accident, other than the Police Accident Report, which is a public document.

(C) Defendants are not in possession of any photographs of plaintiff.

(D) At the time of the occurrence, the within defendants were insured by Scottsdale Insurance Company in the amount of \$1M per occurrence.

Dated: New York, New York  
September 24, 2007

Yours etc.,

KRAL, CLERKIN, REDMOND,  
RYAN, PERRY & GIRVAN, LLP  
Attorneys for Defendant  
JOHN D. CORRIERI AND PAUL D.  
CORRIERI  
170 Broadway, 5<sup>th</sup> Floor  
New York, New York 10038  
(212) 406-9710  
Our File Number: 901774

By:   
JUSTINE L. GRISANTI (#0793)

TO: DAVID RESNICK & ASSOCIATES  
Attorneys for Plaintiff  
450 Seventh Avenue, Suite 409  
New York, New York 10123  
(212) 279-2000

AFFIDAVIT OF SERVICE

STATE OF NEW YORK       )  
                                      : ss.  
COUNTY OF NEW YORK     )

MICHELE SUTTON, being duly sworn deposes and says:

Deponent is not a party to the action, is over Eighteen (18) years of age and resides in Staten Island, New York.

On September <sup>24</sup>, 2007, deponent served the within RULE 26 (a) (1) INITIAL DISCLOSURE upon the attorney(s) listed below at the address designated by said attorneys for that purpose by depositing a true copy of same enclosed in a post-paid addressed wrapper with self-addressed stamped envelopes in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

DAVID RESNICK & ASSOCIATES  
Attorneys for Plaintiff  
450 Seventh Avenue, Suite 409  
New York, New York 10123  
(212) 279-2000

  
\_\_\_\_\_  
MICHELE SUTTON

Sworn to before me on this  
24 day of September, 2007

  
\_\_\_\_\_  
NOTARY PUBLIC

MARCIA M. GOLDSON  
Notary Public, State of New York  
No. 01GO6029683  
Qualified in Richmond County  
Commission Expires August 23, 2009

Index No. 13256/07

Year 20

**SUPREME COURT OF THE STATE OF NEW YORK; COUNTY OF BRONX**

**SALLY ANN DRUCKER,**

**Plaintiffs,**

**-against-**

**JOHN D. CORRIERI AND PAUL D. CORRIERI,**

**Defendants.**

**RULE 26 (a) (1) INITIAL DISCLOSURE**

**KRAL, CLERKIN, REDMOND, RYAN  
PERRY & GIRVAN, LLP**

*Attorneys for*

170 BROADWAY  
NEW YORK, NEW YORK 10038  
(212) 406-9710

**§2103 (b) (5) Notice: Service of Papers by Electronic Means is Not Accepted**

*Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.*

*Dated:* **September 24, 2007**

*Signature*.....

**JUSTINE L. GRISANTI**

*Print Signer's Name*.....

*Service of a copy of the within*

*is hereby admitted.*

*Dated:*

*Attorney(s) for*

**PLEASE TAKE NOTICE**

Check Applicable Box

☐  
NOTICE OF  
ENTRY

*that the within is a (certified) true copy of a  
entered in the office of the clerk of the within named Court on*

*20*

☐  
NOTICE OF  
SETTLEMENT

*that an Order of which the within is a true copy will be presented for settlement to the  
Hon. one of the judges of the within named Court,  
at  
on*

*20*

*, at*

*M.*

*Dated:*

**KRAL, CLERKIN, REDMOND, RYAN  
PERRY & GIRVAN, LLP**

*Attorneys for*